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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FIRST AMERICAN TITLE INSURANCE
 CO., a Nebraska corporation, as successor in
 interest to Nevada Title Company,

Plaintiff,

v.

ACE AMERICAN INSURANCE COMPANY,
 a Pennsylvania corporation,

Defendant.

AND RELATED COUNTERCLAIM

Case No. 2:18-cv-01823-GMN-VCF

**THE PARTIES' STIPULATION
 [SECOND] FOR EXTENSION OF TIME
 TO SUBMIT THE JOINT PRETRIAL
 ORDER**

Plaintiff First American Title Insurance Company ("First American") as successor-in-interest to Nevada Title Company ("NTC") (collectively, "Plaintiff") and ACE American Insurance Company ("ACE") hereby stipulate and seek the Court's Order extending time to submit the joint pretrial order ("JPTO") until Monday, November 20, 2023. Additionally, the parties seek to extend the time to submit evidentiary objections in Sections VII(a) and VII(b) of the joint pretrial order until after the

1 completion of mediation, which the parties are presently in the process of scheduling.

2 The Parties have corresponded extensively and met and conferred, and have continued to
3 cooperatively prepare the JPTO in exchanging drafts that incorporate the Parties' input and in
4 complying with LR 16-3 and LR 16-4 in getting pretrial matters completed. ACE has represented that
5 it needs additional time to complete the JPTO, and Plaintiff does not oppose the request.

6 The Parties agree that the extension is necessary to complete mediation in advance of an
7 agreed-upon trial date. This extension is not requested for any purpose of delay. By the Court's Order,
8 the JPTO was due November 13, 2023.

9 The Parties agreed upon a mediator to accomplish pre-trial mediation, and dates in December
10 2023 and January 2024 were offered the Parties by the mediator's staff. Surprisingly, the mediator
11 has now indicated he is not available. The Parties are working to find a new agreed-upon mediator.
12 Plaintiff has provided further potential mediators, whom the Defendant is considering.

13 This stipulation and request to enlarge the deadline for portions of the JPTO is upon good cause
14 shown and is submitted in the best interest of justice and is in the Parties' best interests.

15 Respectfully submitted,

16 DATED: November 16, 2023

KENNEDYS CMK LLP

17 By: /s/ Michael W. Melendez

18 Michael W. Melendez

19 LAW OFFICES OF STEVEN J. PARSONS

20 /s/Steven J. Parsons

21 Steven J. Parsons

22 *Attorneys for Plaintiff*

23 FIRST AMERICAN TITLE INSURANCE
24 CO., a Nebraska corporation, as successor in
interest to Nevada Title Company

25
26 Dated: November 16, 2023

27 
28 U.S. DISTRICT JUDGE